

YOSHIDA & ASSOCIATES  
A Law Corporation

RANDAL YOSHIDA (Hawaii Bar No. 3059)  
randal@ERISAFundcounsel.com  
NOAH K. PETERSON (Hawaii Bar No. 10734)  
noah@ERISAFundcounsel.com  
ROBERT ZANE (Hawaii Bar No. 10719)  
robert@ERISAFundcounsel.com  
RYAN YOSHIDA (Hawaii Bar No. 11496)  
ryan@ERISAFundcounsel.com  
P.O. Box 61474  
Honolulu, Hawaii 96839-1474  
Telephone: (808) 536-6614  
Facsimile: (808) 206-9898

Attorneys for Plaintiffs  
TRUSTEES OF THE HAWAII SHEET  
METAL WORKERS' TRUST FUNDS

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

TRUSTEES OF THE HAWAII SHEET	)	CIVIL NO. 21-00265-JMS-RT
METAL WORKERS' TRUST FUNDS	)	
(Pension, Health & Welfare, Annuity,	)	PLAINTIFFS' MOTION FOR
Training and Vacation & Holiday, by	)	ORDER OF EXAMINATION OF
their Trustees, Glenn Saito, Skye	)	JUDGMENT DEBTORS: (1) AKUA
Matsumoto, Sam Fujikawa, Paul Saito,	)	AIR CONDITIONING LLC, a
Arthur B. Tolentino, Rick V. Paulino,	)	Hawaii Limited Liability Company,
Jeanine Lum, and Paul Fujinaga),	)	by its members Catherine A. Baitlon
	)	and Calbert H. Baitlon; (2)
Plaintiffs,	)	CATHERINE A. BAITLON,
	)	individually; and (3) CALBERT H.
vs.	)	BAITLON, individually;
	)	DECLARATION OF NOAH K.
AKUA AIR CONDITIONING LLC, a	)	PETERSON; DECLARATION OF
Hawaii Limited Liability Company;	)	RYAN LOEFFERS; EXHIBIT "1";
	)	PROPOSED ORDER FOR

CATHERINE A. BAITLON, and	)	EXAMINATION OF JUDGMENT
CALBERT H. BAITLON,	)	DEBTORS; CERTIFICATE OF
	)	SERVICE
Defendants.	)	
	)	
	)	

---

PLAINTIFFS' MOTION FOR ORDER OF  
EXAMINATION OF JUDGMENT DEBTORS: (1) AKUA AIR  
CONDITIONING LLC, a Hawaii Limited Liability Company, by its  
members Catherine A. Baitlon and Calbert H. Baitlon; (2) CATHERINE  
A. BAITLON, individually; and (3) CALBERT H. BAITLON, individually

Plaintiffs TRUSTEES OF THE HAWAII SHEET METAL  
WORKERS' TRUST FUNDS (hereinafter referred to as "Judgement  
Creditors"), through its attorneys, Yoshida & Associates, A Law  
Corporation, respectfully moves this Honorable Court for an Order directing  
1) AKUA AIR CONDITIONING LLC, a Hawaii Limited Liability  
Company, by its Members Catherine A. Baitlon and Calbert H. Baitlon; 2)  
CATHERINE A. BAITLON, individually; and 3) CALBERT A. BAITLON,  
individually, (hereinafter referred to collectively as "Judgment Debtors"), to  
appear before a designated judge of this court at a time certain, for an  
examination under oath as to what property the Judgement Debtors owns or  
has/had any interest in, what debts are owing to Judgment Debtors, to  
produce the documents listed in said Order, and any further relief as the  
Court may require.

This motion is made pursuant to Rule 69 of the Federal Rules of Civil Procedure and Hawaii Revised Statutes Section 636-4 and is based upon the Declaration of Noah K. Peterson, Declaration of Ryan Loeffers, Exhibit “1” attached hereto, and the records and files included herein.

DATED: Honolulu, Hawaii, December 12, 2025.

YOSHIDA & ASSOCIATES  
A Law Corporation

By /s/ Noah Peterson  
NOAH K. PETERSON  
Counsel for Plaintiffs  
TRUSTEES OF THE HAWAII  
SHEET METAL WORKERS’  
TRUST FUNDS